1	Ashley M. McDow (245114)						
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3	BAKER & HOSTETLER LLP 11601 Wilshire Boulevard, Suite 1400						
4	Los Angeles, CA 90025-0509 Telephone: 310.820.8800						
5	Facsimile: 310.820.8859 Email: amcdow@bakerlaw.com						
6	mdelaney@bakerlaw.com ffarivar@bakerlaw.com						
7	Attorneys for Debtor	n					
8	SOUTHERN INYO HEALTHCARE DISTRICT	l					
9	UNITED STATES BANKRUPTCY COURT						
10	EASTERN DISTRICT OF CALIFORNIA						
11	FRESNO DIVISION						
12	In re	Case No.: 2016-10015					
13	SOUTHERN INYO HEALTHCARE	Chapter 9					
14	DISTRICT,	Doc. No.: BH-20					
15	Debtor.	DECLARATION OF ASHLEY M.					
16		MCDOW IN SUPPORT OF THE EMERGENCY MOTION TO CONTINUE HEARING ON THE STATUS					
17 18		CONFERENCE AND THE ASSOCIATED FILING DEADLINES					
19		Proposed Hearing:					
20		Date: November 1, 2017 Time: 1:30 p.m.					
21		Place: Dept. A, Ctrm. 11 U.S. Bankruptcy Court					
22		2500 Tulare Street Fresno, CA 93721					
23							
24							
25	I, Ashley M. McDow, hereby declare:						
26	1. I am an attorney duly admitted to practice before this court. I am a partner with						
27	the law firm of Baker & Hostetler LLP ("Baker"), general insolvency counsel for the Southern						
	Inyo Healthcare District in the above-captioned bankruptcy case (the " <u>Debtor</u> " or the " <u>District</u> ") I submit this declaration in support of the contemporaneously filed <i>Emergency Motion to</i>						
28							

Continue Ho	earing on the	Status Conferen	ice and the Asso	ociated Deadline:	s (the "	Emergency
<u>Motion</u> ").1						

2. On or about October 18, 2017, Marshall B. Grossman of Orrick ("Orrick") sent a correspondence to Baker, on behalf of Healthcare Conglomerates Associates, LLC ("HCCA"), advising Baker of a potential conflict of interest that HCCA believes to have arisen as a result of the filing of the Termination Motion due to Baker's prior representation of HCCA in the Bankruptcy Case. Baker does not believe that there is any actual or potential conflict of interest, particularly given the nature and scope of the conflict waivers executed by both HCCA and the District, but in an abundance of caution, and in order to ensure that the interests of the District are protected to the fullest extent, Baker believes that the continuance requested in the Emergency Motion will enable the District and HCCA to reach a voluntary agreement regarding rejection and/or termination or enable the district to retain special counsel to prosecute the issues arising from and relating to the Termination Motion.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of October, 2017, at Calabasas, California.

/s/ Ashley M. McDow Ashley M. McDow

¹ Capitalized not defined herein have the same meaning given to them as in the underlying Emergency Motion.

PROOF OF SERVICE 1 I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. I 2 am an employee of Baker Hostetler LLP. My business address is: Baker & Hostetler LLP, 11601 Wilshire Blvd., Ste. 1400, Los Angeles, CA 90025-0509 3 On or about October 25, 2017, I served a true and correct copy of the foregoing documents entitled: DECLARATION OF ASHLEY M. MCDOW IN SUPPORT OF THE 4 EMERGENCY MOTION TO CONTINUE HEARING ON THE STATUS 5 CONFERENCE AND THE ASSOCIATED FILING DEADLINES will be served or was served and in the manner stated below: 6 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): 7 Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On or about, October 18, 2017, I checked the 8 CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email 9 addresses stated below: 10 Office of the U.S. Trustee ustpregion17.fr.ecf@usdoj.gov 11 Gerald N. Sims on behalf of Creditor BETA Risk Management Authority 12 jerrys@psdslaw.com; bonniec@psdslaw.com 13 Kenneth J. MacArthur on behalf of Creditor EverBank Commercial Finance, Inc. kjm@troygould.com 14 Lisa M. Peters on behalf of Creditor GE HFS, LLC 15 lisa.peters@kutakrock.com; marybeth.brukner@kutakrock.com 16 Trevor R. Pincock on behalf of Creditor Healthcare Resource Group tpincock@lukins.com; stracht@lukins.com; stracht@lukins.com 17 Daniel G. Sheldon on behalf of Creditor J.M.H., II, a minor, by and through his guardian ad 18 litem, Mayra Huerta dsheldon@ssnlaw.com; kterrazone@ssnlaw.com; ncastro@ssnlaw.com 19 Peter E. Tracy on behalf of Creditor Milton R. Jones, M.D. 20 invomono@stanfordalumni.org: mdecoster3@gmail.com 21 Paul J. Pascuzzi on behalf of Creditor Optum Bank, Inc. ppascuzzi@ffwplaw.com; lnlasley@ffwplaw.com; kwidder@ffwplaw.com 22 Russell W. Reynolds on behalf of Creditor Southern Mono Healthcare District 23 rwrlaw4335@aol.com; rreynolds@ch-law.com; sjohnson@ch-law.com 24 Riley C. Walter on behalf of Interested Party Tulare Local Healthcare District ECF@w2blaw.com 25 Riley C. Walter on behalf of Interested Party Tulare Local Healthcare District 26 ECF@w2blaw.com 27 Robin S. Tubesing on behalf of U.S. Trustee Tracy Hope Davis robin.tubesing@usdoj.gov; ustpregion17.fr.ecf@ust.doj.gov 28

DECLARATION OF ASHLEY M. MCDOW

1 2. SERVED BY UNITED STATES MAIL: On October 25, 2017, I caused to be served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge and/or other parties 3 named constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed. 4 3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE 5 **TRANSMISSION, PHONE OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on October 25, 2017, I caused to be served the 6 following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. 7 Listing the judge and/or other parties constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed. 8 Honorable Fredrick E. Clement 9 United States Bankruptcy Judge 510 19th Street Second Floor 10 Bakersfield, California 93301 11 Honorable Fredrick E. Clement 12 United States Bankruptcy Judge 2500 Tulare Street 5th Floor, Courtroom 11 13 Fresno, CA 93721 14 Healthcare Conglomerates Associates, LLC c/o Paracorp Incorporated 15 10940 Wilshire Blvd., Ste. 1600 Los Angeles, CA 90024 16 17 Healthcare Conglomerates Associates, LLC c/o Marshall Grossman 777 South Figueroa Street 18 **Suite 3200** 19 Los Angeles, CA 90017-5855 20 Healthcare Conglomerates Associates, LLC c/o Marshall Grossman 21 631 Wilshire Boulevard Suite 210 22 Santa Monica, CA 90401 23 I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. 24 I declare under penalty of perjury under the laws of the United States that the foregoing is 25 true and correct. 26 October 25, 2017 Karla Hernandez /s/ Karla Hernandez Printed Name Date Signature 27 28

DECLARATION OF ASHLEY M. MCDOW